

USDC No. 4:22cv106-DMB-JMV

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In the County Court of Coahoma County, Mississippi

Estate of Lori Ann Overturf, Deceased
Mike Mills, Administrator

Plaintiff

Vs.

Cause No. 14CO1:22-CV-70

JOHN DOE, Agent for Guardian Life Insurance Company of America
Guardian Life Insurance Company of America

Defendants

Complaint on Life Insurance Policy

1. On or about the day of September 1, 2019, defendant issued a policy whereby the defendant insured the life of Lorie Ann Overturf, DOB 07/31/1967, his wife, who died on December 27, 2020, of which the defendant has had proper notice.
2. This policy was issued at his place of employment, Molded Acoustical Products of Easton, Inc., as a benefit offered to the employees and the funding for the life insurance was paid by Mills directly through his employer with the payment being withheld from his paycheck.
3. As a result, the amount of the policy is now due, and the plaintiff is the beneficiary of the proceeds of the policy.
4. On information and belief, the company had an appointed agent selling the life insurance to the employees of which James Michael Mills was one.
5. There have been conversations with the company wherein they have denied that they will pay the \$200,000.00 even though they charged Mills for that amount life insurance, and he paid and kept the life insurance current.


EXHIBIT 4

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Wherefore plaintiff demands judgment against defendant in the sum
of \$200,000.00 dollars, interest and costs.

 _____, James Micheal Mills,
Administrator of the Estate of Lorie Ann Overturf

Of Counsel:

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